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ONEnergy-BSz-140

**MVM ONENERGY ZRT.
CODE OF CONDUCT
INTERNAL REGULATION**

Gábor Orbán
CEO

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1. Objective

As a key player in the Hungarian security of power supply, MVM ONEnergy Zrt. (hereinafter referred to as ONEnergy or **Company**) must meet rigorous moral standards and represent the highest ethical level. ONEnergy can create substantial value as a successful, national and regionally prominent company only if it holds its managers and employees to the same high level of professional and ethical standards.

ONEnergy's operation is founded on the principles of integrity, strict compliance with the laws and regulations and with shareholder expectations, and respect for the individual. The key factors of its successful operation, Hungarian and international recognition and good reputation are its managers' and employees' knowledge, experience, talent, outstanding performance and commitment to the MVM Group and to ONEnergy in particular, along with the promotion of the values the group shares. The relationship of trust developed with our business partners (buyers, suppliers and service providers) and with governmental and supervisory bodies can be maintained in the long run only through the commitment, high-level performance and personal integrity of our managers and employees.

Also by establishing this ONEnergy-BSz-140 MVM ONEnergy Zrt.'s Internal Regulations on the Code of Conduct (hereinafter referred to as **Code of Conduct**), the Company represents that it endorses and puts forward for others to follow all the moral values and principles that contribute to strengthening human relations, performing professional work to the best of abilities, implementing common goals, along with preserving and enhancing ONEnergy's and MVM Group's traditions, reputation, professional and institutional integrity.

The purpose of issuing the Code of Conduct is to

- set out the ethical conduct and rules of behaviour applicable to ONEnergy employees,
- set out further requirements for 's senior and executive officers (hereinafter jointly referred to as **managers**),
- provide assistance to the managers and employees in complying with them,
- protect ONEnergy's managers and employees against attempts to involve them in any abuse, arbitrary employer measures and unfounded disciplinary procedures,

The Code of Conduct does not contain all the standards of behaviour expected of ONEnergy's managers and employees, it only sets out the main requirements in issues of major ethical importance.

By nature, provisions of the Code of Conduct do not substitute compliance with legislation and the Company's internal regulation. In any case, the stricter standard shall apply.

Any behaviour in conflict with the requirements of the Code of Conduct may be prosecuted by the Company and by the MVM Group, not only in cases of wilful acts but also negligence.

This Code of Conduct was prepared in line with the MVM Group's Code of Conduct, fully observing the provisions set out therein.

Pursuant to ONEnergy's Articles of Association and the MVM Group's Central Management Code, the MVM Group's Code of Conduct shall apply directly.

In order to comply with group level regulation, this Code of Conduct sets forth the regulations applicable to the Company – by way of reflection –, with the proviso that it shall neither limit, nor prejudice the scope and application of the MVM Group's Code of Conduct.

Unless separately specified in this regulation, the term Code of Conduct used herein shall also refer to the MVM Group's Code of Conduct.

2. Scope of Regulation

2.1. Term

These rules shall be applicable as of the date of their entry into force by the Company's CEO until repealed.

2.2. Personal Scope

The personal scope of the regulation shall cover all employees at ONEnergy, the Company's executive officers, temporary agency workers employed at the Company, together with any and all persons in any other employment relationship with ONEnergy or acting on behalf of ONEnergy (hereinafter jointly referred to as: **employee** or **employees**).

2.3. Material Scope

The material scope of the regulation shall cover any and all activities at the Company.

3. References

- ONEnergy-SzMSzMVM ONEnergy Zrt.'s Organizational and Operational Rules
- Act No. V of 2013 on the Civil Code (hereinafter referred to as Civil Code)
- KIE-19 MVM Group Central Directive on Compliance
- ONEnergy-BSz-019 MVM ONEnergy Zrt.'s Internal Regulations on the Performance of Legal Compliance Activities
- ONEnergy-BSz-141 MVM ONEnergy Zrt.'s Internal Regulation on Managing Organizational Integrity Incidents and Complaints
- ONEnergy-BSz-142 MVM ONEnergy Zrt.'s Internal Regulation on Insider Information Management and the Identification and Prevention of Market Abuse
- ONEnergy-BSz-143 MVM ONEnergy Zrt. Internal Regulation on Integrated Risk Management Procedures
- ONEnergy-BSz-144 MVM ONEnergy Zrt.'s Internal Regulation on Conflicts of Interest
- ONEnergy-BSz-145 MVM ONEnergy Zrt.'s Internal Regulation on Gifts
- ONEnergy-BSz-146 MVM ONEnergy Zrt.'s Internal Regulation on Capital Market Compliance for Shareholders
- ONEnergy-BSz-455 MVM ONEnergy Zrt.'s Internal Regulation on Labour Safety
- ONEnergy-BSz-457 MVM ONEnergy Zrt.'s Internal Regulation on the Handling of Public Information Requests
- Internal Regulation on Information Security
- Internal Regulation on Information Security and Data Protection
- Internal Regulation on Information Security Risk Management

4. Definitions

- **Inside Information:** information of a precise nature which has not been made public, which relates, directly or indirectly, to one or more wholesale energy products and which, if it were made public, would be likely to significantly affect the prices of those wholesale energy products.
- **Compliance Department Head:** A person designated in ONEnergy's Organizational and Operational Rules

5. Content of the Code of Conduct

5.1. Our Values

The Code of Conduct lays down rules and principles of conduct facilitating authentic and responsible operation for the Company and setting requirements beyond the legal standards to serve as general reference points. Compliance with them shall be expected from any and all employees, employees with temporary employment or other work relationship, officers and persons acting on behalf of the Company (hereinafter referred to as employee).

Every employee and the example set by the managers at ONEnergy are of key importance in establishing the ethical culture.

In order to meet the requirements set out by the shareholder, the society and by the Company, it represents the following values:

Engagement – Taking responsibility for results and standing up for what is right, even in difficult situations. Making relevant and timely decisions promoting the organisation’s development.

Cooperation – Establishing partnership and cooperating with others to achieve common goals. Building trust through honesty, integrity and credibility.

Customer orientation – Establishing stable and close external and internal customer relations and promoting customer-oriented solutions.

Transparency – Transparency in organizational operations, which includes the timely, open and honest sharing of information, transparency in decision-making processes and responsible communication to foster trust and integrity.

Serving the public – including work performed at business organisations where the state is the majority owner – has intrinsic moral value, yet it also sets high moral requirements for the employees, particularly for those in management positions. On the one hand, this means compliance with ethical requirements stricter than what is generally expected, while on the other hand, it also involves compliance with professional ethical principles that are required only from those serving the public.

In addition to the provisions set forth above, the Company’s chief executive officer and employees in executive positions are required to perform their duties by:

- **leading by good example** regarding the conduct expected from employees,
- **supporting** the employees in carrying out their tasks,
- consistently **checking** the employees’ performance of legal and ethical obligations,
- **enforcing professional and business ethics aspects** in their management decisions.

5.2. ONEnergy’s Commitments in Business Ethics

5.2.1. Protection of Human Rights

The MVM Group is committed to respecting every stakeholder’s human rights.

Human rights include a range of civil, political, economic, social and cultural rights, based on applicable legislation and guidelines from the United Nations (UN) and OECD, including:

- the right to human dignity,
- the right to life,
- the right to personal freedom and safety,

- the right to the best attainable state of health,
- the right to just and favourable working conditions, with particular regard to gender equality
- the right to fair wage and decent living conditions,
- the right to an adequate standard of living,
- the right to form and join trade unions and to bargain collectively,
- the right to freedom from forced and compulsory labour,
- the right to freedom from child work,
- the right to non-discrimination,
- the right to freedom of expression.

ONEnergy aims not only to respect human rights, but it also actively supports their enforcement in its own operations, while endeavouring to make a positive social impact.

ONEnergy supports the protection of human rights and condemns all forms of violating human rights.

5.2.2. Health, Safety and Environmental Protection

ONEnergy provides safe work environment for all its employees. By continuously improving its environmental performance, the company reduces the health, safety, and environmental risks associated with its special activity. In addition, it places strong emphasis on ensuring that each employee understands and complies with the safety, accident prevention and environmental regulations. ONEnergy pays special attention to protecting the health of its staff, offers and organizes leisure and sports activities.

During its activities ONEnergy observes the environmental requirements set out by the law, licenses, regulations and standards, and expects the same from its business partners. For the sake of continuously improving its environmental performance, the Company gives priority to energy efficiency and energy saving. In line with Act No. LVII of 2015 on Energy Efficiency and Government Decree No. 122/2015 (V.26.) on the implementation thereof, ONEnergy operates an energy management system as part of its Integrated Management System corresponding to the ISO 50001 standard for its power trade activity, and has it certified by an independent third party.

Taking ownership of the basic principles of sustainability in performing its tasks, the Company - in line with the goals of the MVM Group - aims at mitigating the impact on environment elements and ecological systems, reducing harmful emissions, as well as eliminating any earlier and preventing any further environmental damage. During its activities, it observes the environmental requirements set out by the law, licenses, regulations and standards, and expects the same from its business partners (details contained in KIE-06-M-09 MVM Group Business Partner Code of Conduct). It supports and promotes the attainment of Community and national climate policy objectives and anticipates national and European needs as far as possible. For the sake of continuously improving its environmental performance, the Company gives priority to energy saving and the rational use of natural resources.

The Company pays special attention to promoting the environmental sensitivity and preparedness of its employees, along with strengthening their commitment to sustainable development and hence to environmental protection. To that effect, employees are expected to report to their direct managers or to the competent person in charge any accident, injury, illness, unsafe or unhealthy condition, environmental damage, damage to nature in order to ensure the prompt start of prevention, intervention, recovery or other required measures.

5.2.3. Equal Treatment

Every employee or employee group at ONEnergy shall be treated with equal respect and care, with equal consideration to the individual aspects. The MVM Group establishes workplace

conditions that are free from discrimination on any ground such as race, colour, sex, disability, language, political or other opinion, national or social origin, property, birth or other status.

ONEnergy is committed to the principle of equal treatment, and encourages its employees to found their work relations on the principles of cooperation, openness, trust, mutual recognition and support.

5.2.4. Privacy and Personal Data Protection

ONEnergy is committed to process its employees' personal data in a confidential manner. When processing personal data, ONEnergy shall act in line with the applicable legislation and regulations. ONEnergy shall only obtain, process and maintain data that are either inevitable for the operation of ONEnergy, or required by law. ONEnergy shall process personal data according to the following:

- a) personal data are processed lawfully, fairly and in a transparent manner in relation to the data subject;
- b) collected for specified, explicit and legitimate purposes only;
- c) personal data processed are adequate, relevant and limited to the minimum necessary in relation to the purposes for which they are processed, ensuring data rationality;
- d) personal data are accurate and kept up to date, and every reasonable step is taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which personal data are processed, ensuring limited storage;
- f) for the sake of data security, technical and organisational measures are implemented observing the principle of integrity and confidentiality, that is during the processing of personal data, they are protected from unauthorised or unlawful processing, accidental loss, destruction or damage;
- g) personal data are processed in accordance with the principle of accountability ensuring that compliance with the above principles can be verified.
- h) Only specifically authorized employees can have access to personal data, and for professional purposes only and only to the extent necessary;
- i) The Company takes appropriate measures to ensure the security of the personal data it processes; it protects the data through preventive security measures, in particular against unauthorised access, modification, forwarding, disclosure, deletion, disposal, or inadvertent destruction and damage.

Detailed corporate rules for personal data processing shall be specified in the Internal Regulation on Data Protection Rules.

5.2.5. Relations with state, municipal and other administrative bodies

ONEnergy maintains continuous relations and cooperates with state, municipal and other administrative bodies and institutions. In such relations, it acts in good faith and fairness, observing the laws and regulations, using only means allowed by legislation.

Being a responsible organization, ONEnergy commits itself to maintaining a cooperative relationship with state, municipal and other administrative bodies. ONEnergy shall pay public law liabilities on time, and ensure the transparency of its financial transactions.

5.2.6. Selecting Suppliers, Business Partners

ONEnergy endeavours to develop relations based on mutual trust and respect with its suppliers and business partners. To that effect, it enters into relations only with persons and companies with good business reputation, appropriate abilities and references, and that meet the requirements specified in the MVM Group Code of Conduct and the MVM Group Business Partner Code of Conduct.

Selecting the suppliers shall be based on the content of their business offers and their previous references, avoiding any conflict of interest or double standards to influence selection.

ONEnergy shall handle confidential business information and other data of its business partners and suppliers in line with the law.

5.2.7. Competitors

ONEnergy supports fair and open competition on every market in Hungary and abroad. It conducts its activity in line with the standards of fair competition, while observing the applicable rules of competition law. It shall obtain data and information used for competitor analyses and market forecasts in a lawful and fair manner only, or by using published data and analyses. ONEnergy represents itself in professional and sectoral associations, organizations and cooperations, actively participating in their operation, and simultaneously bearing in mind the representation of MVM Group interests. Employees representing the Company shall perform their duties on the basis of prior management authorization and in strict compliance with the relevant legal framework and ethical requirements.

5.2.8. Corporate Social Responsibility

MVM Group aims at assuming responsibility for the society, environment, nature and sustainable development according to its importance within the Hungarian economy. To this end, it endeavours to maintain an open and transparent dialogue and consultation with local communities, the civil society and the representatives of sports and scientific life, encouraging its employees to actively participate in the work and development of such communities and civil initiations.

To express its awareness of social problems and to support extraordinary talents and events, ONEnergy is engaged in responsible, group-wide coordinated sponsorship, grant and donation activities. It seeks out opportunities to establish cooperation with national higher education and vocational institutions in order to maintain the operation of the energy industry in the long term. As to its social relations, the Company is committed to disclose full, comprehensible, regular and authentic information to the public with regard to its activities and aspirations, also establishing and maintaining generally positive and high-quality professional relationship with the media.

5.3. Standards of Conduct Expected from MVM Group Employees

During their work, employees shall consider ONEnergy's values, interests and strategic goals and shall act to the best of their professional abilities. Upon detecting an error, they shall immediately make every effort to restore the error-free condition in order to eliminate or mitigate the consequences or any possible, foreseeable damage.

The employer expects its employees to dedicate their working hours to carrying out their work duties to the highest professional standards and the best of their abilities in a responsible manner, without slowing down processes.

ONEnergy expects its employees to actively participate in advanced vocational training programmes and contribute to the maintenance and development of their technical knowledge by self-tuition.

ONEnergy requires its employees' conduct and appearance to be in accordance with MVM Group's professional prestige, and express their respect for the environment, partners and co-workers, even in jobs where work clothes or uniforms are not necessary.

5.3.1. Rule of Law, Compliance

ONEnergy requires legal compliance from every employee, expecting them to observe the provisions of law, along with group level and internal regulations, and to conduct and act in harmony with the interests and ethical standards of the Group.

5.3.2. Safeguarding ONEnergy's Good Reputation

It is in the interest and the obligation of every employee at ONEnergy to represent and safeguard the good reputation of ONEnergy and the MVM Group. If a good overall picture is perceived of the Company and the MVM Group by partners, customers and the public based on the employees' work and conduct, it significantly furthers the external image and professional goal achievement of the Company and the MVM Group.

Therefore, ONEnergy requires its employees to generally contribute to the safeguarding of the good reputation of the Company and the MVM Group also by their behaviour outside their workplace, including any and all personal, digital or social media communication.

5.3.3. Fair and Transparent Operation

ONEnergy considers fair and transparent operation as a key value. It strongly opposes any and all forms of corruption, financial abuse, fraud, bribery, which undermine trust in the company's legitimate operation, distort competition and damage the reputation of the Company and the MVM Group. It is expected from every employee that they shall never seek, accept, offer or provide unjust advantage for themselves, for the company or for any third party whatsoever. In addition, every ONEnergy employee is expected to report corruption activities they become aware of, whether using the channels dedicated to report ethical violations and organisational integrity incidents or by contacting their direct manager or otherwise as provided by law.

5.3.4. Giving, Accepting and Reciprocating Corporate Gifts and Amenities

In addition to acknowledging corporate gifts, invitations or favours materially expressing the satisfaction of customers or business achievements, ONEnergy expects its employees to ensure that acceptance and reciprocation are mere formalities or simple amenities, the tax implications of which shall be duly dealt with by both the giver and the recipient according to the applicable tax laws.

Gifts or hospitality with minor financial significance qualifying as business amenities shall never be offered or given with the purpose of exerting an unfair influence on decision making. One must bear in mind that in certain countries, there are separate regulations for the value and type of gifts and hospitality acceptable by officials.

When accepting a corporate gifts, invitations or favour, utmost care shall be taken.

Employees shall not accept gifts or other benefits if it can be assumed that their purpose is to influence business decisions or gain unfair advantage (they can be regarded as bribery or intent to influence, or they are not in line with the usual business practice and standards).

The value of business gifts and amenities received from business partners cannot exceed HUF 50 000 per year, and they shall be recorded in the Gift Registry, at all times subject to the decision of the direct manager and the Compliance Department regarding the appropriate conduct (e.g.: declining the gift, donation to charity). Where a gift cannot be declined out of politeness or for practical reasons (e.g.: it has been delivered and sending back is not reasonable), and its acceptance would exceed the annual limit, the line manager and the Compliance Department shall decide whether the gift can be kept, or offered for charitable or community purposes.

ONEnergy-BSz-145 MVM ONEnergy Zrt.'s Internal Regulation on Handling Gifts sets forth the rules for handling such gifts.

5.3.5. Information and Data Protection

Employees shall be jointly responsible for the protection of information and data. Employees shall use internal documents and data, information and operational mechanisms supplied to them during work only for the purposes of performing tasks required by their job position at ONEnergy, and shall not make accessible or disclose those to third parties unless their direct manager grants consent or instructs them in writing to do so (e.g.: in case of publications containing Company-related information). Personal and sensitive data obtained during work shall only be processed by the employees for the purposes of particular tasks to the extent strictly necessary pursuant to the applicable rule of law and the internal regulations. Data thus obtained shall not be released to any third party, with special regard to disseminating them to or discussing them with other employees.

Corporate rules for information security shall be specified in the Internal Regulation on Information Security and the Internal Regulation on Information Security Risk Management.

ONEnergy developed a system of data security rules in its internal regulations, which focuses on establishing and safeguarding the security of ONEnergy's IT systems and the confidentiality, integrity and availability of data managed by such systems, along with specifying the roles, responsibilities and rights in relation to data security. Employees shall act in line with the applicable regulations, and use the office space in a manner that ensures corporate data protection.

5.3.6. Conflict of Interest

Company employees shall avoid any conflict of interest in their jobs and also the appearance of such conflicts.

With regard to conflicts of interest and the related reporting obligation, the provisions of ONEnergy-BSz-144, Internal Regulation on Conflicts of Interest, shall apply.

Conflict of Interest shall mean a situation in which business, financial, family, political or personal interests may interfere with the judgment, functions, performance or decision-making of persons performing obligations arising from employment or other legal relationship of work for the organisation. The Company shall consider a conflict of interest to be any situation in which a conflict between workplace and private interests exists or arises that may have a negative impact on decision-making, performance and assertion of interests in business, at the workplace.

Employees shall report in writing to the manager exercising employer rights if he or she or any of their close relatives (Section 8:1, Subsection (1), Item 1 of the Civil Code) is or intends in the near future to be a fully liable partner, majority/dominant owner, executive officer, or an employee, agent, subcontractor, advisor, employee (uniformly: contributor) in any business organisation that either has a regular economic relationship with the employer or is engaged in an activity similar to that of the employer.

In each management position and in other specific job titles and in individual cases, the employer shall be entitled to require a written statement from the employee concerned to the effect that neither the employee, nor his/her close relative has any conflict of interest with regard to the given job title, case or task. Employees refusing to provide such statement may be prevented from contributing to the relevant case or assignment, and shall not have any executive position at the Company.

Employees - in such capacity - shall not participate in the evaluation of tenders submitted by a business organisation or other organization in which they or their close relatives [Section 8.1. (1)2 of the Civil Code] have ownership rights or other interests, or executive positions. Such concerned employees shall immediately report a potential conflict of interest, and shall refrain from any action or measure that results in a conflict of interest.

During their employment relationship, Company employees shall not work with or perform services to companies or persons that they are in any relationship in connection with their job at the Company or the MVM Group.

For establishing any business relationship with competitors, customers or suppliers where there might be a suspicion of conflict of interest, a written prior permission from the holder of employer rights shall be required.

Regarding any other copyright-related or intellectual activities (e.g.: giving presentations, compiling studies), utmost care shall be taken by the employee to avoid accepting invitations based on which they can be considered as obliged by the inviter or the requesting party.

Company employees shall cooperate in managing and addressing conflicts of interest quickly and efficiently.

5.3.7. Rules on Insider Trading and the Prohibition of Market Abuse

Any and all employees are required to comply with the provisions set forth in ONEnergy-BSz-142MVM ONEnergy Zrt.'s Internal Regulation on Insider Information Management and the Identification and Prevention of Market Abuse. Pursuant to these rules, it shall be prohibited for employees to misuse insider information or engage in or attempt to engage in manipulation during the conclusion of or bidding for transactions. It is also prohibited to use inside information to buy or sell shares or other financial instruments or products, to recommend or encourage third parties in any way to buy or sell such shares or other financial instruments or products.

5.3.8. Protecting Corporate Property

ONEnergy employees shall assume responsibility for the proper handling, preservation, good and rational use of assets owned or provided by the company.

Employees may only use corporate assets and facilities for private purposes if they have been specifically authorised, also observing the provisions of the Company's internal regulation documents.

5.3.9. Public Engagement

ONEnergy supports the employee's public appearance if it furthers the Company's and the MVM Group's good reputation and professional development. The employer particularly encourages that employees participate in the scientific life and in the advocacy groups related to their professional areas where they can strengthen the positive public image of the employer.

In line with group level regulations, ONEnergy's employees shall inform the Communication Director of the MVM if they visit professional forums or external conferences – in case of participation by purchasing tickets and/or through sponsorship.

For the sake of a uniform group appearance, ONEnergy employees may participate in external professional forums and conferences as speakers only upon prior approval from the MVM's Communication Director, in compliance with group level regulations. (ONEnergy-BSz-140-D-01)

It is prohibited to express political views, make statements, make promises that are in conflict with the law, the internal regulations or agreements, or to provide unreliable information on behalf of the MVM Group or the Company on any forum – including the workplace.

ONEnergy will not restrict its employees' political involvement – outside the workplace and the working hours –, however in such cases, employees shall not use the name, contact details or communication channels of the Company or the MVM Group, and the political activity shall not be in conflict with the interests of the MVM Group and the Company.

5.4. Further Ethical Requirements for all ONEnergy Managers

The required standards of conduct shall apply to any and all ONEnergy employees, however, as outlined in Section 5.1, employees in management positions shall be subject to special requirements.

The Company's chief executive and employees in managerial positions shall be fair, consistent and equitable with their subordinate employees while exercising their professional management rights, and shall refrain from any conduct offending the human dignity of their subordinates.

5.4.1. Leading by Personal Example

Managers at ONEnergy shall lead by example and act as a signpost for ethical behaviour, also ensuring that good community spirit and an atmosphere facilitating efficient and cooperative work are established. The manager shall accept professional dissenting opinions and take responsibility for the decisions he or she makes under his or her decision-making authority. Proper conditions shall be provided to the employees for the sake of performing their professional duties at the required level, efficient cooperation between subordinates shall be encouraged and achievements shall be announced and evaluated regularly. ONEnergy's management shall promote the ethical and business ethics standards adopted by the MVM Group and the Company in every field of the Company's activity.

Leading by example, involving ethical leadership – both in everyday situations and in difficult circumstances – ,is of particular importance, since the managers are in charge of planning activities, organizing work processes, managing implementation and performing the related control tasks at ONEnergy and its organizational units. Responsible, equitable and forward-looking management could serve as the foundation for high-quality professional work.

5.4.2. Relationship with Subordinates

Managers required to aim to get to know their subordinates at the organizational unit they manage, develop a good understanding of their personalities and level of knowledge, continuously improve their professional expertise, and resolve conflicts with the personal involvement of the affected parties. Managers shall handle any and all information obtained with due care and confidentiality. In addition, managers are expected to also lead by example in establishing an atmosphere that facilitates good team spirit, cooperation and efficient work, and in resolving any conflicts through the personal involvement of those concerned.

Managers are expected to refrain from any conduct that anyone can consider as violent, intimidating, malicious, ill-intentioned or offensive and to set an example in their conduct for their subordinates.

ONEnergy utterly condemns any and all forms of harassment. In particular, harassment committed by a manager against a subordinate. Of the many types of harassment, this particularly regards sexual harassment, which includes any non-consensual conduct such as bodily contact and advances, sexual comments or demands in word or deed. In order to prevent and detect such abuses, the MVM Group and ONEnergy pays special attention to informing the employees and maintaining a reporting line.

MVM Group managers shall make personnel decisions and evaluate their subordinates exclusively on the basis of their professional merits, their performance and work-related conditions.

5.4.3. Relations with other Organisational Units, Managers

ONEnergy requires that in addition to the assertion of strategic objectives and interests, its managers shall also seek cooperation, fast exchange of required information and a generally efficient joint work with other companies and organisational units within the Group.

5.5. Legal Implications of Violating the Code of Conduct

Any behaviour in conflict with the requirements of the Code of Conduct may be prosecuted by the Company and by the MVM Group (criminal measures, measures under employment or other law), not only in cases of wilful acts but also negligence. The procedure to be applied in the event of a violation of the Code of Conduct shall be governed by ONEnergy-BSz-141 MVM ONEnergy Zrt.'s Internal Regulation on Organizational Integrity Incidents and Complaints

5.6. Verification of Understanding the Code of Conduct

Every employee shall confirm their understanding of the provisions of this regulation by participating in the compliance training for new recruits and the annual compliance training.

5.7. Related Process Guidelines

There are no related process guidelines.

6. Repealment

MVMP-BSz-74 MVM Partner Zrt.' Code of Conduct (version 5.0)

7. Annexes and Templates

- ONEnergy-BSz-140-M-01 MVM ONEnergy Zrt.'s Code of Conduct Decision- Making Authority List

